

**IN UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION**

**DALILLAH SHORT; KENICHA JOHNSON;  
NICOLE BOYKINS; individually and on behalf  
of a class of all others similarly situated,**

**PLAINTIFFS**

**V.**

**CIVIL ACTION NO. 4:22-cv-00095-DMB-DAS**

**MISSISSIPPI DELTA COMMUNITY  
COLLEGE (MDCC); DR. TYRONE JACKSON,  
President of MDCC, in his official and individual  
capacities; DERRICK FIELDS, MDCC Dean of  
Student Services, in his official and individual  
capacities; DR. STEVEN JONES, MDCC Vice  
President of Administrative and Student Services,  
in his official and individual capacities;  
PATRICIA KELLY, MDCC Dean of Health  
Science, in her official and individual Capacities;  
TRACI BECKHAM, MDCC Director of Nursing  
and MDCC Associate Degree Nursing (ADN)  
Chair, in her Official and individual capacities**

**DEFENDANTS**

**NOTICE OF SERVICE OF INITIAL DISCLOSURES**

NOTICE IS HEREBY GIVEN that Joseph L. Adams has this day served on counsel for  
Plaintiff in the above entitled action the following:

Defendant's Initial Disclosure Statement.

Respectfully submitted, this the 17<sup>th</sup> day of January, 2023.

MISSISSIPPI DELTA COMMUNITY COLLEGE,  
DR. TYRONE JACKSON, DR. STEVEN JONES,  
PATRICIA KELLY, TRACI BECKHAM AND  
DERRICK FIELDS

By their Attorneys,  
JONES WALKER LLP

/s/ Joseph L. Adams  
JOSEPH L. ADAMS

OF COUNSEL:

Joseph L. Adams (MSB #10591)  
Jones Walker LLP  
190 E. Capitol Street, Suite 800 (39201)  
Post Office Box 427  
Jackson, Mississippi 39205-0427  
(601) 949-4900  
(601) 949-4804 (fax)  
[jojoadams@joneswalker.com](mailto:jojoadams@joneswalker.com)

**CERTIFICATE OF SERVICE**

I, Joseph L. Adams, do hereby certify that I have this day caused to be filed a true and correct copy of the foregoing document with the Clerk of the Court, using the Court's ECF system, which will provide notification of such filing to counsel of record:

Ms. Paloma Wu  
Mr. Robert B. McDuff  
Mississippi Center for Justice  
210 E. Capitol Street, Suite 1800 (39201)  
P.O. Box 1023  
Jackson, MS 39215  
[pwu@mscenterforjustice.org](mailto:pwu@mscenterforjustice.org)  
[rmcduff@mscenterforjustice.org](mailto:rmcduff@mscenterforjustice.org)

SO CERTIFIED this the 17<sup>th</sup> day of January, 2023.

/s/ Joseph L. Adams  
JOSEPH L. ADAMS